

# EXHIBIT A

# **Ragnvald Mjanger**

**Reliance List**  
***in Addition to Materials Referenced in Report***

## Medical Literature

Agostini A, et al. [Pop 12,280] Immediate complications of tension-free vaginal tape (TVT): results of a French survey. <i>Eur J Obstet Gynecol.</i> 2006; 124:237-239.
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**Medical Literature**

Young, Rosenblatt, et al. The Mersilene mesh suburethral sling: a clinical and urodynamic evaluation. AJOG 1995; 173:1719-1726.



**Production Materials**

<b>Document Description [Bates Range]</b>
A Solution-Gynecare TVT Tension-Free Support for Incontinence.
DEPO.ETH.MESH.00004755 - Guidoin Explant
DX23600-R.1-3 - Prolene Resin Manufacturing Specifications 1.23.03
Email string re - Revised write up of the DeLeval and Waltregny visit
ETH.MESH.00071794 - Email re: TVT IFUs on tape extrusion, exposure and erosion
ETH.MESH.00220335-36 - 12.2.1999 Memo re: Biocompatibility Risk Assessment for Soft Prolene Mesh.
ETH.MESH.00262015-016 - Dan Smith Email Plaintiffs Exhibit 2067
ETH.MESH.00349228 - Cytotoxicity Risk Assessment for the TVT (Ulmsten) Device
ETH.MESH.00373310 - Gynecare TVT Tension-Free Support for Incontinence: General Profession Education Deck.
ETH.MESH.00523942 - Waltregny 2005 ICS Presentation
ETH.MESH.00526473-74 - Allison Brown Email re-Laser-cut Mesh
ETH.MESH.00541379-80 - Mesh Fraying for TVT Devices
ETH.MESH.00575257 - Abbrevio laser cut vs. mechanically cut - notes from meeting with de leval - inappropriate
ETH.MESH.00575270-273 - Jean de Leval Email Re: DSCN3332.JPG May 30, 2009
ETH.MESH.00584811-13 - Email string re-Ultrasonic Slitting of Prolene Mesh for TVT
ETH.MESH.00590896-897 - Piet Hinoul Email 3.11.09
ETH.MESH.00658177-198 - Surgeons Resource Monograph
ETH.MESH.00687819-22 - Email string re-Laser cut mesh
ETH.MESH.00857821 - Top Ten Reason to pursue Gynecare TVT Obturator System
ETH.MESH.00858080-081 - Perry Trial - Plaintiff's Exhibit 2313
ETH.MESH.00858096-97 - Gynecare R&D Monthly Update - May
ETH.MESH.00858175-176 - Mulberry Weekly Meeting MINUTES for 6.3.03
ETH.MESH.00858252-53 - 2004 Memo from London Brown to Dan Smith re Mechanical Cut vs. Laser Cut Mesh Rationale
ETH.MESH.00863391 - T-366 - Dan Smith email - particle loss
ETH.MESH.00870466 - Ethicon Expert Meeting-Meshes for Pelvic floor
ETH.MESH.00993273 - TVT Obturator Anatomic Considerations Clinical Update: Special Considerations, Complications.
ETH.MESH.01202189 - Stale Kvitle Email regarding Mini Me follow up from our visit May 20, 2009
ETH.MESH.01202190-191 - David Waltregny Email Re: Mini Me follow up from our visit May 21, 2009
ETH.MESH.01203957-97 - The future of surgical meshes-the industry's perspective
ETH.MESH.01219542-48 - Review of Surgeon Responses of VOC Questionnaire
ETH.MESH.01220135-45 - Email string re-New Standards for Urethral Slings
ETH.MESH.01228079-84 - Nilsson Podcast Transcript
ETH.MESH.01238454-56 - Email string re-TVTO length
ETH.MESH.01279975-976 - Harel Gadot Email re Next step in SUI sling
ETH.MESH.01317508-613 - TVT Factbook DHF - Revised 05.14.2001
ETH.MESH.01752532-35 - Mesh design argumentation issues
ETH.MESH.01784823-28 - Clinical Expert report-Laser Cut Mesh
ETH.MESH.01785259-260 - Email string re: +M relaxation
ETH.MESH.01808311-318 - Trip Report Michael Tracey
ETH.MESH.01809082-83 - Memo re: VOC on new laser cut TVT mesh
ETH.MESH.01813259; ETH.MESH.02180759-61 - Email string with attachment re-Jeans Ideas.
ETH.MESH.01813975-78 - Email string re-FDA Prep-Plaintiff's Exhibit 460



**Production Materials**

ETH.MESH.01822361-363 - Dan Smith Email regarding TVT Secur October 18, 2006
ETH.MESH.01822361-62 - Dan Smith Email regarding TVT-Secur leading to less retention
ETH.MESH.02017152-56 - 02.23.2007 Ethicon Expert Meeting: Meshes for Pelvic Floor Repair
ETH.MESH.02026591-95 - MSDS-c4001 Polypropylene Homopolymer
ETH.MESH.02090196-209 - Plaintiff's Exhibit 4085-04.15.2008
ETH.MESH.02211890 - Test Report
ETH.MESH.02319312 - Memo re-TVT-base & TVT-O Complaint Review for Laser Cut Mesh Risk Analysis
ETH.MESH.02340331-335 - TVT IFU (12.22.03 to 02.11.05)
ETH.MESH.02340568-90 - TVT-S IFU
ETH.MESH.02340829-835 - TVT-O IFU - (01.07.04 to 03.04.05)
ETH.MESH.02341203-13 - TVT Abbrevio IFU
ETH.MESH.03259439-40 - 4.24.2009 Gauld email chain re Green Journal
ETH.MESH.03427878-883 - TVT IFU - (11.29.10 to 11.26.14)
ETH.MESH.03458123-38 - TVT Patient Brochure
ETH.MESH.03715978 - Weisberg email re: TVT question.
ETH.MESH.03905472-77 - Email string re-TVT recommendation from Dr. Alex Wang
ETH.MESH.03907468-9 - Second Generation TVT - by Axel Arnaud
ETH.MESH.03910175 - Email string re - Soft Prolene
ETH.MESH.03910418-21 - Email string re-Mini TVT - mesh adjustment
ETH.MESH.03911107-08 - Email string re-TVT complications (an Prof. Hausler)
ETH.MESH.03913357-359 - Axel Arnaud Email 5.31.07 Re TVT TVT-O
ETH.MESH.03916905-13 - Plaintiff's Exhibit 3827
ETH.MESH.03924557-86 - Meshes in Pelvic Floor Repair-Findings from literature review and conversations-interviews with surgeons, June 6, 2000.
ETH.MESH.03930120-123 - Nilsson C. Seven-Year Follow-up of the Tension-Free Vaginal Tape Procedure for Treatment of Urinary Incontinence. Obstet Gynecol 2004; 104(6): 1259-62
ETH.MESH.03932909-911 - Confidential - History of TVT-O
ETH.MESH.03932912 - The History of TVT
ETH.MESH.03941623 - DeLeval Email RE: TVT ABBREVO ALERT - French and English Email and English Translation Certification Plaintiff's Exhibit 3619- Perry
ETH.MESH.04048515-520 - Carl Nilsson KOL Interview Project Scion 06.18.08
ETH.MESH.04081189 - Meeting Agenda
ETH.MESH.04082973 - Possible Complications for Surgeries to Correct POP and SUI
ETH.MESH.04092868 - Email re : 10100080654 and TVT IFUs
ETH.MESH.04938298-299 - Piet Hinoul Email Re: Prof. de Leval - TVT Abbrevio
ETH.MESH.04941016 - Lightweight Mesh Developments (Powerpoint)
ETH.MESH.04945231-239 - Email string re-Ultrapro vs Prolene Soft Mesh
ETH.MESH.04945496 - Bernd Klosterhalfen Email Re: Ultrapro vs. Prolene Soft Mesh April 18, 2005
ETH.MESH.05225380-384 - TVT IFU - (09.08.00 to 11.26.03)
ETH.MESH.05337217-220 - Email string, top one from D. Miller to J. Paradise, et al
ETH.MESH.05347751-762 - Email string re Investigator-initiated studied policy
ETH.MESH.05479411 - The (clinical) argument of lightweight mesh in abdominal surgery
ETH.MESH.05479535
ETH.MESH.05588123-126 - Stephen Wohler Email - AW: How inert is polypropylene? July 9, 2007
ETH.MESH.05644163-171 - Pelvic Floor Repair-Surgeon's Feed-back on Mesh Concept
ETH.MESH.05799233-39 - TVT Exact IFU
ETH.MESH.05918776 - Email re: Marlex Experience

**Production Materials**

ETH.MESH.05958248 - Surgeons Resource Monograph
ETH.MESH.05998835-836 - Piet Hinoul Email Re: ALERTE TVT ABBREVO
ETH.MESH.06592243 - 09.14.2012 Email from Carl Nilsson to Laura Angelini
ETH.MESH.06695438 - Justification for Utilizing the Elasticity Test as the Elongation Requirements on TVT LCM
ETH.MESH.06887138-40 - Waltregny email written on behalf of Professor de Leval.
ETH.MESH.06887244 - 07.16.04 David Waltregny email to Dan Smith re: TVT-O.
ETH.MESH.06917699-704 - Form For Customer Requirements Specification (CRS) For Project TVT-O PA
ETH.MESH.06923868-71 - TVTO-PA Clinical Strategy - 8.21.13 Exhibit A.M. Mitchell T-2177
ETH.MESH.07192929 - Investigating Mesh Erosion in Pelvic Floor Repair Powerpoint
ETH.MESH.07226579-590 - 2000 - TVT CER
ETH.MESH.07383730-31 - Email string re-Ultrapro mesh information-identical mesh to Prolift +M
ETH.MESH.08003181-96 - TVT Patient Brochure
ETH.MESH.08003231-46 - TVT Patient Brochure
ETH.MESH.08003279-94 - TVT Patient Brochure
ETH.MESH.08003295-302 - TVT Patient Brochure
ETH.MESH.08299913-917 - Nilsson C. Seventeen years' follow-up of the tension-free vaginal tape procedure for female stress urinary incontinence. Int Urogynecol J 2013; 24(8): 1265-9 [9.11.13 Exhibit T-1271]
ETH.MESH.08315779 - Clinical Expert report-09.25.2012
ETH.MESH.08334244; ETH.MESH.08334245 - Email re Photographs of LCM vs MCM with attachments
ETH.MESH.08334244-45 - Email string re-Photographs of LCM vs MCM with powerpoint attachment
ETH.MESH.09264945-46 - Prolene Mesh Re-Design Project
ETH.MESH.09630649 - 4.26.1973 FDA Letter RE: NDA 16-374
ETH.MESH.09656792
ETH.MESH.09656795
ETH.MESH.09744858-63 - TVT Patient Brochure
ETH.MESH.09746948-998 - License and Supply Agreement [Rosenzweig Exhibit 21 - 12.22.15]
ETH.MESH.09747038-097 - Medscand Agreement
ETH.MESH.09747337-369 - Asset Purchase Agreement
ETH.MESH.09888187-223 - Seven Year Data for Ten Year Prolene Study - Plaintiff's Exhibit 4102
ETH.MESH.09922570-578 - R&D Memorandum of PA Mesh Assessments for TVTO-PA Revision 1
ETH.MESH.10281860 - Tension-Free Midurethral Sling: Market Update.
ETH.MESH.11336474-87 - Ten Year In Vivo Suture Study Scanning Electron Microscopy-5 Year Report - Plaintiff's Exhibit 4111
ETH.MESH.12831391-92 - P4128 - IR Microscopy of Explanted Prolene received from Prof. R. Guidoin.
ETH.MESH-08476311 - Cytotoxicity assessment of Ulstem sling
Gynecology Solutions
Johnson & Johnson - Our Credo [8.9.13 A.M. Mitchell Exhibit T-3134]
June, 2009 Klosterhalfen intermediate report on explanted mesh (highlighted)
Klinge Presentation PVDF: a new alternative? Meeting o Hernia Experts Exhibit P-1944
Librojo updated TVT Declaration (10-23-15) [12 pages]
McCabe email re - Sheath Sales Tool - 464
MSDS-Marlex Polypropylenes
P4122 - SEM Figure 183: Sample J7959 13409 (Photographs)
Payments to Medscand [9.16.13 Exhibit T-3192]
Payments to Medscand by J&J [9.16.13 Exhibit T-3183]
Payments to Ulmsten as Consultant [9.16.13 Exhibit T-3204]

**Production Materials**

Published clinical data and RCTs - Ethicon.com - 4204-C
Seven Year Dog Study - T-2263
TVT Abbrevio IFU - 01.2015
TVT Exact IFU - 01.2015
TVT IFU - 01.2015
TVT Patient Brochure - 2015
TVT-O la bandelette trans-obturatrice (Photograph)
TVT-Obturator IFU - 01.2015

**Company Witness Depositions**

<b>Deponent [Date of Deposition]</b>
Hinoul, Piet - 04.05.2012 Deposition Testimony
Hinoul, Piet - 09.18.2012 Deposition Testimony
Weisberg, Martin - 05.24.2012 Deposition Testimony
Weisberg, Martin - 8.9.2013 Deposition Testimony
Weisberg, Martin - 11.12.2015 Deposition Testimony
Weisberg, Martin - 11.13.2015 Deposition Testimony
Nager, Charles - 06.10.2014 Deposition Testimony

**Other Materials**

<b>Publically Available</b>
24 Hour Summary of the Gastroenterology and Urology Devices Panel of the Medical Devices Advisory Committee Meeting [02.26.2016].
FDA - Device Labeling Guidance #G91-1 March 1991
FDA Considerations about Surgical Mesh for SUI [03.27.2013].
FDA Executive Summary: Surgical mesh for treatment of women with POP and SUI [09.08.2011]
FDA News Release: Surgical Placement of mesh to repair pelvic organ prolapse poses risk [07.13.2011].
FDA Public Health Notification: Serious Complications Associated with Transvaginal Placement of Surigical Mesh in Repair of POP and SUI. Issued: 10.20.2008.
FDA Questions: Reclassification of the Urogynecologic Surgical Mesh Instrumentation.
Device Labeling Guidance
Deposition Subject Matter-Design and Development of Mesh Products
Oxford Levels of Evidence; <a href="http://www.cebi.ox.ac.uk/fileadmin/_processed_/csm_Evidence_pyramid_bluef5c85529a0.jpg">www.cebi.ox.ac.uk/fileadmin/_processed_/csm_Evidence_pyramid_bluef5c85529a0.jpg</a>
AUA Guideline for the Surgical Management of Female Stress Urinary Incontinence Update (2009)
ACOG, AUGS Practice Bulletin Summary of 155 (replaces 63 from 2005) Urinary Incontinence in Women. November 2015.
AUGS SUFU Position Statement on MUS for SUI
AUGS SUFU Frequently Asked Questions by Patients MUS for SUI
AUGS SUFU Frequently Asked Questions by Providers MUS for SUI
AUGS Position Statement on Restrictions of Surgical Options for Pelvic Floor Disorders
AUA (2011) - Position Statement on the Use of Vaginal Mesh for SUI
FDA Considerations about Surgical Mesh for SUI
IUGA Position Statement on MUS for SUI (2014)
IUGA Mid-urethral sling (MUS) procedures for stress incontinence (2011)
2013 Sept. NICE 171 Guideline - The management of urinary incontinence in women
ICS Fact Sheet 2015
RANZOG and UGSA 2014 Position Statement
2012 ABOG - Guide to Learning in Female Pelvic Medicine and Reconstructive Surgery
AUA National Medical Student Curriculum Urinary Incontinence
AUGS Resident Learning Objectives
ACGME Program Requirements.

**Betty McCumber - Case Specific**

<b>Depositions</b>
McCumber, Betty - 4.11.2017
<b>Expert Reports</b>
<b>Other</b>
<b>Medical Records</b>
Adena Health Systems - Billing 1-7
Adena Medical Group - Billing 1-9
Adena Regional Medical Center - Pathology 1-2
Adena Regional Medical Center - Radiology 1-1
Adena Regional Medical Center - Radiology 2-2
Adena Urology - Billing 1-7
Adena Urology - Billing 8-16
Adena Urology - Medical 1-5
Adena Urology - Medical 17-17 (cert)
Adena Urology - Medical 6-6 (cert)
Adena Urology - Medical 7-16
Baker Joyce LPC - Medical 1-1 NRS
Centers for Medicare & Medicaid - Insurance NR cert or letter 1-1
Centers for Medicare & Medicaid - Insurance NR cert or letter 2-3
Haller Marla D DO - Medical 1-2 NRS
Holzer Clinic - Medical 1080-1101
Holzer Clinic - Medical 1-256
Holzer Clinic - Medical 251-515
Holzer Clinic - Medical 516-1079
Holzer Medical - Billing 10-14
Holzer Medical - Billing 1-9
Holzer Medical Center - Billing 15-16
Holzer Medical Center - Medical 137-191
Holzer Medical Center - Medical 1-93
Holzer Medical Center - Medical 94-136
Holzer Medical Center - Medical cert 192-192
Holzer Medical Center - Pathology 1-1 NRS
Holzer Medical Center - Radiology 1-24
Holzer Medical Center - Radiology 25-27
Kincaid Stephen Craig Dr - Medical 1-134
Kings Daughters Family Care - Medical 1-31
Kings Daughters Family Care - Medical 132-132
Kings Daughters Family Care - Medical 133-719

**Betty McCumber - Case Specific**

Kings Daughters Family Care - Medical 32-90
Kings Daughters Family Care - Medical 720-769
Kings Daughters Family Care - Medical 770-844
Kings Daughters Family Care - Medical 91-131
Kings Daughters Family Care Centers - Billing 845-874
Nooranissa J Pasha MD - Medical 1-1 NRS
Ohio Health Heart And Vascular Physicians - Medical 1-1
Ohio Health Physician Group - Billing 1-1
Plaintiff Profile Form 1-5
Plaintiff Profile Form 6-10
Plaintiff Supplied Records - 198-294
Plaintiff Supplied Records 100-197
Plaintiff Supplied Records 1-1
Plaintiff Supplied Records 2-99
Shriver Family Practice - Medical 1-17
Shriver Family Practice - Medical 18-18 CER
Shriver Family Practice - Medical 19-19 CER
Southern Ohio Medical Center - Billing 1-1 NRS
Southern Ohio Medical Center - Medical NR cert or letter 1-1
Southern Ohio Medical Center - Pathology 1-1 NRS
Southern Ohio Medical Center - Radiology 1-1
SSA Retirement and Disability - 1-290
SSA Retirement and Disability - 291-592